

Case # 2:15-cr-00015-JPJ-PMS-11

Defendant Wesley Gross

CLERK'S OFFICE U.S. DISTRICT COURT  
AT ABINGDON, VA  
FILED

MAY 15 2020

JULIA C. DUDLEY, CLERK

BY:

DEPUTY CLERK

As to my motion for compassionate release I feel it pertinent to address the court with some additional thoughts. On April 7 I sent a request to the warden requesting to be placed on home confinement pursuant to The newly signed CARES act. As of May 10 I have not received a response. When an increasing number of inmates were placed in quarantine and it became evident that F.C.I. Ft. Dix could not control the spread of Covid-19, I filed a request for compassionate release with the warden on April 17. On May 3 I had received no response and the number of cases continued to grow to over 50. We also received word that a covid-19 positive officer had worked in Food Service and potentially exposed inmates who are housed in my unit. At this point I decided I couldn't wait any longer for the wardens response which I felt would almost certainly be denied and I filed a motion with this court for compassionate release. I am both terrified and convinced that if I contract this disease I will die.

2

New Jersey has the second most positive cases in the U.S. of COVID-19. It only takes 1 guard exposing 1 inmate in my housing unit and at that point the spread is inevitable, it cannot be contained.

I realize I committed a serious offense and recognize the need for my current sentence, however given the current pandemic I plead for the court to use its Broad range of discretionary powers. If I were to be granted compassionate release the court has the option of imposing a term of probation or supervised release. I plead with the court to grant compassionate release along with a term of probation conditioned with home confinement for a length of the courts choosing. I would also like to point out to the court that although I have completed the Drug Education program required to satisfy The requirement of this court, I am also signed up to take the Residential Drug Abuse Program. In normal times this program would make me eligible to be transferred to a Residential Reentry Halfway House in

3

November of 2021 approximately 18 months from now. Perhaps in light of this as a condition of probation if compassionate release is granted some type of Drug counseling would be appropriate.

I hope that in these extraordinary circumstances that these conditions would mitigate any concerns over minimizing my sentence. I am trying to offer suggestions to the court that will maintain justice while dealing with the effects of the covid-19 pandemic which unfortunately for me could very well be death.

Thank you for your time.

Respectfully,  
Wesley Cross